IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION
NATALIE SOTO,

MAR 1 0 2025

FILED IN CLERK'S OFFICE U.S.D.C. - Atlanta

Plaintiff,

٧.

WENDELL HOLMES, JR.,

Defendant.

Civil Action No. 1:24-cv-02911-SDG

AFFIDAVIT OF WENDELL HOLMES DENYING PLAINTIFF'S CLAIMS

STATE OF GEORGIA

COUNTY OF [Cobb County]

I, Wendell Holmes, Jr., being duly sworn, depose and state as follows:

I. INTRODUCTION

- 1. My name is Wendell Holmes, Jr., and I am the Defendant in this case.
- 2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge.
- 3. I submit this affidavit to formally deny the allegations made by Plaintiff, Natalie Soto, and to confirm that I did not engage in any wrongful conduct.

II. DENIAL OF PLAINTIFF'S ALLEGATIONS

- I never sent, shared, or distributed any intimate images or videos of Plaintiff to Dawn Douglas or anyone else.
 - I never possessed any intimate images or videos of Plaintiff.
- 6. Plaintiff has not provided any authenticated evidence that I engaged in any wrongful conduct.
- 7. Plaintiff has not submitted subpoenaed records from Facebook, text message logs, or forensic evidence proving that I sent or distributed any images.
 - 8. Plaintiff's claims are based on speculation and lack factual support.

III. LACK OF EVIDENCE AGAINST ME

- 9. I have reviewed the evidence provided by Plaintiff, and it does not contain:
- a. Any identifying information that links me to the alleged messages or images.
- b. Any records from social media companies proving that I sent any images.
- c. Any witness testimony or forensic analysis supporting Plaintiff's allegations.
- 10. Since there is no factual or documentary evidence against me, I respectfully request that the Court dismiss Plaintiff's claims.

IV. REQUEST FOR RELIEF

- Based on the lack of evidence and the false nature of Plaintiff's claims, I respectfully request that this Court:
- a. Dismiss Plaintiff's Complaint with prejudice.
- b. Grant any other relief the Court deems just and proper.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this _____ day of March, 2025.

Wendell Holmes, Jr.

5934 Rosie LN SE

Mableton, GA 30126

(404) 664-2943

Pro Per (Self-Represented Defendant)

NOTARY PUBLIC SECTION (IF REQUIRED)

STATE OF GEORGIA

COUNTY OF [Your County]

Sworn to and subscribed before me on this ____ day of March, 2025 by Wendell Holmes, Jr., who proved to me through satisfactory evidence to be the person signing this document.

Notary Public

My Commission Expires: August 26, 2028

